

EXHIBIT A1

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1 Q. This is that meeting with the attorneys in
2 January of '96?
3 A. Yes.
4 Q. Okay. We will hold on that. Do you have
5 any basis, do you have any personal knowledge as to
6 whatever was communicated in that meeting was
7 communicated to anyone else in MetLife?
8 A. The meeting was precipitated by a memo I
9 wrote to CMO members. No, I do not have any
10 specific knowledge that --
11 Q. It went beyond --
12 A. No.
13 Q. -- the legal organization?
14 A. No.
15 Q. Okay. Now, one of your allegations is you
16 had a history, and I will quote here, "history of
17 reporting violations."
18 A. Yes.
19 Q. Including violations, churning and
20 accelerating premiums, vanishing premiums, which we
21 have sort of generically referred to as "public
22 policy."
23 A. Yes.
24 Q. I will now be more specific. It's those
25 issues that we are now talking about in terms of
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1 public policy, the accelerated payments, the --
2 A. Yes.
3 Q. -- vanishing premiums, the churning
4 allegations, correct?
5 A. Yes.
6 Q. And those are problems that obviously
7 there was general publicity with regard to issues
8 raised against MetLife and other insurance
9 companies by various lawsuits, insurance
10 commissioners, et cetera. I assume it was brought
11 to your attention in that respect like every other
12 MetLife employee, but it was also, I take it,
13 brought to your attention by customers who would
14 call in to the call center organization, raising
15 issues?

16 A. My efforts started long before MetLife was
17 the subject of investigation and litigation on
18 those issues.

19 Q. All right. Now, I am going to mark a
20 number of documents here that you produced to us
21 not necessarily to go over them in any great
22 specificity, --

23 A. Okay.

24 Q. -- but for you to help me identify and
25 understand which ones you think fall in this

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1 category.
2 A. Sure.
3 (Certain documents were marked Deposition
4 Exhibits 37 through 43, inclusive, for
5 identification by the reporter.)
6 THE WITNESS: Okay.
7 Q. (BY MR. POOR) What I am interested in,
8 tell me which groups reflect your history of
9 reporting violations in obtaining the status of
10 whistle blower, as alleged in Paragraph 43, so we
11 can talk about those without talking about the ones
12 that --

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13 anyone did affirmatively to say to you, "it's a bad
 14 thing that you are raising this, don't do this any
 15 more, you are in trouble for" – when I say
 16 criticism, that's what I am talking about in that
 17 line?

18 A. No, I don't recall any specific criticism.
 19 Q. Okay. Now, which one of these documents
 20 generated a meeting with lawyers?
 21 A. That one.
 22 Q. Now, you have handed me documents that
 23 Bates stamped PL-01199 through -01202.

24 A. Yes.
 25 MR. POOR: Why don't we mark that
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1 separately just for the purposes –

2 THE WITNESS: Sure.
 3 MR. RAYL: (Affirmative head nod).
 4 MR. POOR: – of keeping it straight.

5 Would you mark this as 46.

6 (A certain document was marked Deposition
 7 Exhibit 46 for identification by the reporter.)
 8 Q. (BY MR. POOR) This is a memo you wrote to
 9 Mr. Lynch in November of '95, expressing your
 10 concern over the field release on AP arrangements?

11 A. Yes.
 12 Q. Okay. What happened after you sent that
 13 letter to Mr. Lynch?
 14 A. I did get a note from him, I believe
 15 that's the one that he responded to, said it was of
 16 interest, asked for some statistics, but it also
 17 was copied to Mr. Tweddie, who was a CMO member,
 18 but it was sometime – I'm trying to keep my years
 19 straight – no, I guess it was relatively quickly,
 20 December-January, somewhere in that time frame I
 21 received a call from the law department and they
 22 wanted to know when I would be in New York and that
 23 they would like to discuss AP with me.
 24 Q. Okay. Who did you get the call from?
 25 A. It was either Mr. Finnegan or – I believe
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1 it was Kevin Finnegan.

2 Q. Who is an attorney in the law department?

3 A. Yes.

4 Q. Okay. And then you did have a meeting
 5 with the lawyers in the law department?

6 A. It met with Kevin Finnegan and Robert
 7 Nostramo.

8 Q. Okay. Between sending the letter and your
 9 meeting, did you have any other communication with
 10 Mr. Lynch or anyone else in the organization on
 11 this issue other than perhaps asking for
 12 statistics?

13 A. Most of what I wrote on this issue started
 14 in 1992. No, I don't –

End Letter
 15 Q. I meant not on this issue, necessarily,
 16 but specifically in response to this memo?

17 A. No.

18 Q. The next thing substantively really that
 19 happened was the meeting with the attorneys?

20 A. Yes, it was.

21 Q. Okay.

22 MR. POOR: I am going to ask him about the
 23 meeting with the attorneys for the purposes of the
 24 deposition, Brian. Obviously, you know it's our
 25 position that this is a privileged communication,

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